

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

August 30, 2011

TO: Internal File *100271 for*

THRU: Steve Christensen, Permit Supervisor

FROM: April Abate, Team Lead *aaa 8/31/2011*

RE: Relocation of Truck Dump and Culverts, Savage Services Corporation, Savage Coal Terminal, C007/0022 Task # 3892

SUMMARY:

On August 18, 2011, the Division of Oil, Gas and Mining (the Division) received an amendment by Savage Services Corporation (the Permittee) to relocate a temporary truck dump that was located on the eastern side of the permit area to a location approximately 125 feet south/southwest of the former location. In addition, several culverts have been upgraded and select diversions have been removed and/or replaced with culverts.

The amendment is not recommended for approval until the deficiencies outlined herein are resolved:

[R645-301.512.100 & 722.500]: Please update Figures 5-2 and 7-2 to adequately represent the existing surface configuration and topographic elevation of the refuse pile. Maps should depict the realigned diversion ditch CD-13 and a more accurate representation of the topographic elevation and contours of the refuse pile.

[R645-301-741]: Please update Table 7-26 to reflect that C-22 has been removed and make any necessary updates to the design specifications of CD-13 on the table based on the realignment of this ditch.

TECHNICAL ANALYSIS:

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Existing Surface Configuration Maps

The Permittee submitted an updated Facility Map (Figure 5-2) showing the relocated truck dump approximately 125 feet to the south/southwest of its previous location. The refuse pile that abuts the temporary truck dump to the south is shown at a maximum elevation of 5,530 feet on the map. According to inspection report #2832 completed on August 17, 2011, most of this refuse pile has been recovered and shipped off the permit area. As a result, diversion ditch CD-13 has been realigned and the topographic elevation and contours of the refuse pile has been significantly reduced. Therefore Map 5-2 should be updated to reflect those changes.

Surface Water Resource Maps

The Permittee submitted an updated Hydrology Map (Figure 7-2) showing the updated drainage controls in the permit area. The two 18-inch culverts that were both designated as CD-3 have been replaced by a single 24-inch culvert still designated as CD-3. The refuse pile on the southeast corner of the property no longer shows Diversion C-22 – a flexible pipe that transported runoff off the refuse pile into a diversion that flowed into Sediment Pond #5. According to Division inspector, Peter Hess, diversion ditch CD-13 has been realigned and is not accurately represented on Maps 5-2 and 7-2. As with Figure 5-2, the topographic elevation and contours of the refuse pile has been significantly reduced and therefore Map 7-2 should be updated to reflect those changes.

Certification Requirements

Plates 5-2 and 7-2 were both certified by Dan W. Guy, a Registered Professional Engineer with the State of Utah #154168.

Findings:

[R645-301.512.100 & 722.500]: Please update Figures 5-2 and 7-2 to adequately represent the existing surface configuration and topographic elevation of the refuse pile. Maps should depict the realigned diversion ditch CD-13 and a more accurate representation of the topographic elevation and contours of the refuse pile.

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Discharge Structures

Updated culvert design specifications have been submitted on an updated Table 7-25. Changes include replacing ditch CD-9 with culvert CD-3, expanding the length of C-5, which also drains into pond #5, and expanding the length of CD-24 near the shop facility.

Culvert CD-17 was removed as part of the temporary truck dump relocation. Diversion C-22 has been removed from the refuse pile. Both structures have been updated on Table 7-25 as removed. Diversion CD-9 was replaced by culvert C-3.

Table 7-26 which details refuse pile drainage design specifications was not updated to reflect that C-22 has been removed. All culverts and diversions have been appropriately sized to meet or exceed the 10-year, 24-hour storm.

Findings:

[R645-301-741]: Please update Table 7-26 to reflect that CD-22 has been removed and make any necessary updates to the design specifications of CD-13 based on the realignment of this ditch.

RECOMMENDATIONS:

The amendment is not recommended for approval until the deficiencies outlined herein are resolved.